

Exhibit 2

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION
TRACY CAEKAERT and CAMILLIA MAPLEY,
PLAINTIFFS,
-against- Case No.:
CV-20-52-BLG-SPW
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW
YORK, INC., and WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,
DEFENDANTS.
-----X
ARIANE ROWLAND and JAMIE SCHULZE,
PLAINTIFFS,
-against- Case No:
CV-20-59-BLG-SPW
WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW
YORK, INC., and WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,
DEFENDANTS.
-----X
DATE: March 8, 2024
TIME: 9:06 A.M.
VIDEO-RECORDED DEPOSITION of the
Defendant by a witness, THOMAS JEFFERSON,
JR., taken by the respective parties,
pursuant to a Notice and to the Federal

1 T. JEFFERSON

2 the testimony of two witnesses or on the
3 testimony of three witnesses, the matter
4 should be established."

5 Jehovah's Witnesses adhere to
6 this scriptural exhortation and direction
7 that, before taking any action that is in
8 the context of whether someone should or
9 should not be established as guilty of
10 misconduct, there needs to be two witnesses
11 or a confession.

12 But this thought of a two
13 witness rule, no. Jehovah's Witnesses
14 don't have a two witness rule. We have
15 what the Bible says to establish a certain
16 accusation.

17 Q. The Bible principle you just
18 quoted to me is elaborated upon in numerous
19 publications that Jehovah's Witnesses have
20 sent to elders to guide them in their
21 duties; correct?

22 A. Yes.

23 Q. What do you call that
24 principle?

25 A. Just that, a Bible principle.

1 T. JEFFERSON

2 Q. Well, the Bible has lots of
3 principles; right?

4 A. Yes.

5 Q. So which Bible principle is it?

6 A. It's a Bible principle that
7 outlines how conduct is established in the
8 absence of a confession.

9 Q. So your no answer to my
10 previous question was about the use of the
11 word rule?

12 A. I believe, in the form of your
13 original question, you asked me about a two
14 witness rule -- not an exact quote -- that
15 Jehovah's Witnesses adhere to. We don't
16 have a two witness rule. We have a Bible
17 principle that helps elders to see that,
18 when establishing an accusation, you need
19 to abide by the fact that there are two
20 witnesses -- eye witnesses to the conduct.

21 Q. That's a lot of words for me
22 to use as a shorthand referring to that
23 principle. Could we call it the two
24 witness principle?

25 A. We can call it what the Bible

1 T. JEFFERSON

2 calls it that, namely, you need two
3 witnesses to establish whether an
4 accusation of conduct can be upheld,
5 period. Obviously, I can't dictate what
6 you call it, but that's what I'd like to
7 call it.

8 Q. To the extent that principle is
9 addressed in the publications that are
10 provided to elders that we've discussed
11 earlier today, that -- those publications
12 contain Jehovah's Witnesses' interpretation
13 of the relevant Bible verses regarding that
14 principle; correct?

15 A. Those publications explain what
16 Deuteronomy 19:15 and several other Bible
17 verses say with regard to assisting people
18 who are alleged to have been involved in
19 some form of conduct that conflicts with
20 the Bible. Elders are instructed to be
21 guided by that principle before determining
22 whether a person should or should not
23 remain as one of Jehovah's Witnesses.

24 Q. And that would apply to elders
25 in the Hardin Congregation during the

1 T. JEFFERSON

2 relevant time period; correct?

3 A. Yes.

4 Q. Were there any changes to that
5 principle between 1973 and 1992?

6 A. Deuteronomy 19:15 is unchanged.

7 Q. Were there any changes to
8 Jehovah's Witnesses' interpretation of that
9 principle between 1973 and 1992?

10 A. And I'd ask you to clarify what
11 you mean by interpretation since I repeated
12 two or three times already what we do
13 understand, and that remains unchanged.
14 Maybe I'm missing something respectfully.

15 Q. We've talked all day about how
16 the manuals contain or the publications
17 contain interpretations of Bible principles
18 that are helpful to guide elders; right?

19 A. Yes.

20 MR. TAYLOR: Objection to form.

21 Q. That was a yes?

22 A. Yes, we have.

23 Q. So that's the definition of
24 interpretation I'd like you to use in
25 answering the question that's pending.

1 T. JEFFERSON

2 A. So what question would you like
3 to pose again, Counsel?

4 MR. MERRILL: Would you please
5 read it back?

6 THE REPORTER: Okay.

7 (Whereupon, the referred to
8 question was read back by the
9 Reporter.)

10 A. No.

11 Q. The principle that we're
12 discussing from the Bible regarding the
13 presence of two witnesses is interpreted in
14 the 1972 Kingdom Ministry School Course and
15 in the Pay Attention to Yourselves and All
16 the Flock publications; correct?

17 A. Perhaps. I don't know if
18 there's a specific reference you would like
19 me to draw attention to or is that a
20 general question as to whether it appears
21 in the document?

22 Q. It appears in both documents;
23 correct?

24 A. I don't know unless I look
25 exactly. I mean, I don't know. Is there a

1 T. JEFFERSON

2 specific reference you want me to comment
3 on or...

4 Q. You testified earlier that you
5 spent hours reading those documents to
6 prepare for this deposition. Do you recall
7 that?

8 MR. TAYLOR: Objection to the
9 form. It's not a memory test.

10 A. I testified that I spent hours
11 reviewing documents in preparation for the
12 deposition. I did not say I read every
13 single word and sentence in those
14 documents, Counsel.

15 So if there is something
16 specific you'd like me to comment on, I'd
17 be more than happy to address it.

18 Q. I'd like you to please read
19 topic 26B into the record. Please start
20 with 26, and then you can skip to B, you
21 know, skip over A. Thank you.

22 A. "All details of what is
23 commonly referred to as the two witness
24 rule or two witness principle as it existed
25 between 1973 and 1992 including how the

1 T. JEFFERSON

2 rule and any changes to it were
3 communicated to elders, including any and
4 all written guidance provided to local
5 congregations regarding application of the
6 rule and whether that guidance was ever
7 communicated on WTNI -- WTNV letterhead or
8 contained in WTNV documents."

9 Q. Your testimony, as you sit here
10 today, is that you don't know whether that
11 two witness principle is included in the
12 documents 1972 Kingdom Ministry School
13 Course or versions of Pay Attention to
14 Yourself and All the Flock. Is that
15 correct?

16 A. No. My testimony is I cannot
17 comment specifically on what was said. I'm
18 not denying that it may have been
19 mentioned, not by any stretch. But what
20 specifically, where, context, at this
21 moment, I cannot say exactly.

22 Q. I'm not asking you whether it
23 may have been mentioned. I'm asking you
24 whether it was mentioned.

25 A. And I'm telling you I don't

1 T. JEFFERSON

2 recall exactly.

3 MR. MERRILL: And I'll object
4 to that answer as nonresponsive to
5 topic 26B.

6 Q. Are there other publications
7 during the relevant time period where the
8 principle was discussed?

9 A. Yes.

10 Q. Which ones?

11 A. Watchtowers, Awakes.

12 Deuteronomy 19:15 is discussed multiple
13 times in our publications. It would be a
14 voluminous review for me to try to sit down
15 and point to every sentence in every
16 article where Deuteronomy 19:15 appears.

17 So the answer is yes to your
18 question. In multiple places, in study
19 articles, in the Watchtower, it -- it is
20 mentioned frequently throughout the
21 publications and certainly over the
22 relevant period.

23 Q. If this principle of needing
24 two witnesses or a confession to establish
25 a matter was discussed in the 1972 Kingdom

1 T. JEFFERSON

2 Ministry School Course or in versions of
3 Pay Attention to Yourselves and All the
4 Flock, would that discussion guide elders?

5 A. Yes.

6 Q. If, during the relevant period,
7 elders received a report that a young girl
8 in a Jehovah's Witness congregation was
9 sexually abused by another member of the
10 congregation and the alleged abuser denies
11 that allegation, and there are no witnesses
12 besides the young girl and the elder or --
13 excuse me -- the alleged abuser -- pardon
14 me -- do I understand correctly that the
15 truth of the matter of the allegation would
16 not be able to be established?

17 A. If a child accused an adult of
18 child sexual abuse during the relevant
19 period and the elders investigating the
20 matter were unable to establish through
21 confession from the accused or testimony of
22 two witnesses that this actual allegation
23 is true, then there would be no judicial
24 action taken against the accused.

25 Q. That means that the accused

1 T. JEFFERSON

2 would continue to be in the congregation;
3 correct?

4 A. Correct.

5 Q. The accused could continue to
6 participate in the field service?

7 A. Correct.

8 Q. Let's talk about topic 27. Was
9 there any rule or principle or policy about
10 keeping certain information within
11 Jehovah's Witness congregations
12 confidential during the relevant period?

13 A. And so Counsel, in Proverbs
14 11:13 -- this is what guided the elders
15 then and still does today -- "A slanderer
16 goes about revealing confidential talk, but
17 the trustworthy person keeps confidence."

18 This guidance then, in the
19 relevant period, served to guide elders
20 related to information that came to their
21 attention about the conduct of congregants.

22 Q. And you said that was -- was it
23 Proverbs did you say?

24 A. Yes, sir. Proverbs 11 and --
25 and verse 13.

1 T. JEFFERSON

2 Q. Is that verse discussed in
3 Jehovah's Witness publications?

4 A. Yes, it is.

5 Q. And would those publications
6 include the Jehovah's Witnesses'
7 interpretation of that verse and guidance
8 on how to apply it?

9 A. Yes.

10 Q. Can you give me a general
11 statement of what that verse means and how
12 it's interpreted?

13 A. Congregants who encounter
14 difficulties in their life seek pastoral
15 help from shepherds, what we read about
16 earlier in First Peter 5. A wide range of
17 problems from marital difficulties to
18 serious health concerns are discussed with
19 elders who -- by congregants who are
20 seeking comfort and guidance.

21 Other times, though,
22 congregants approach elders because they've
23 made a serious error in judgment, and they
24 want help to see how to work out their
25 problem. When that happens, they approach

1 T. JEFFERSON

2 the elders, and they share that
3 confidential information with them.

4 It's understood that elders, in
5 discussing this problem, will not share
6 that information with their wives or their
7 children or anyone else not entitled to
8 know about it. That's the application of
9 that principle.

10 Q. Who else is entitled to know
11 about it?

12 A. If the information that the
13 congregant has shared requires that
14 attention needs to be given as to whether
15 they remain Jehovah's Witnesses or not, the
16 body of elders as a whole will be informed.

17 Q. Other than the body of elders
18 of that congregation, would any other
19 Jehovah's Witnesses in the congregation be
20 informed?

21 A. Generally not, no.

22 Q. What's the exception to your...

23 A. Well, let's say that the
24 congregant who is approaching the elders is
25 16 years old. He's just confessed that, in

1 T. JEFFERSON

2 his relationship with a friend, they
3 actually committed a crime. His parents,
4 who are Jehovah's Witnesses, are unaware of
5 it.

6 However, the elders realize
7 that in order for him to receive the help
8 he needs, even though he doesn't want his
9 parents to know, they're going to have to
10 know. They'll see to it that the parents
11 are informed. They'll then give the minor
12 the chance to inform his parents, and
13 they'll even give him time.

14 A man who is married to his
15 wife goes on a business trip. And on his
16 business trip, they close a contract and
17 they go to dinner with the business
18 partners. For reasons he can't explain,
19 when he wakes up the next morning, his
20 secretary is beside him in the bed, and he
21 doesn't know how she got there because they
22 both had quite a bit to drink that night.

23 He loves his wife very much,
24 but he tells the elders, I've done
25 something seriously wrong, and I need help,

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2 and I don't know how to tell my wife. Can
3 you help me?

4 That's an example of where the
5 elders will see to it that his wife knows
6 through him. They'll help him, but she has
7 to know. And also, they'll keep the matter
8 confidential because others outside of his
9 wife -- his brother in the same
10 congregation, his cousin in the same
11 congregation -- they don't need to know.

12 That's an example of applying
13 the principle I just discussed with you and
14 why elders are urged not to discuss it with
15 others, even though the man's wife is the
16 elder's wife's best friend. Those are two
17 examples to illustrate my point, Counsel.

18 Q. Do elders ever share
19 information they received in confidence
20 with non-Jehovah's Witnesses?

21 A. Yes.

22 Q. When?

23 A. When a crime is committed, such
24 as child sexual abuse, the elders will
25 oftentimes report it, and that reporting

1 T. JEFFERSON

2 will go to the secular authorities who are
3 not Jehovah's Witnesses.

4 Q. Are you referring to the
5 current practice of calling -- elders
6 calling the legal department for advice on
7 reporting requirements when they hear of an
8 allegation?

9 A. That's part of it, yes.

10 Q. Prior to 1992, did the
11 Jehovah's Witnesses provide any guidance or
12 direction to elders to call local
13 authorities in the event of an allegation
14 of child sex abuse?

15 A. It was first in July of 1989
16 that elders were advised to call the legal
17 department to seek such advice.

18 Q. What other circumstances would
19 elders share information they received in
20 confidence with non-Jehovah's Witnesses?

21 A. Sometimes what happens,
22 Counsel, is that elders may become aware
23 that someone plans to commit a serious
24 crime. For example, they want to blow up a
25 place. They plan to -- to shoot up a

1 T. JEFFERSON

2 place, for example.

3 Elders become aware of that
4 even if they become aware of it in
5 confidence. Then if the prospect of such a
6 crime looms before them, they will call the
7 authorities and apprise them of it. That's
8 an example.

9 Q. Have there been changes in the
10 obligation with respect to the obligation
11 of elders to keep information confidential
12 when they received in it confidence during
13 the relevant period --

14 A. Well, that's --

15 Q. -- besides the 1989 letter that
16 you referenced about calling the legal
17 department?

18 A. First, excuse my interruption.
19 And when you say changes, what do you mean,
20 Counsel?

21 Q. What does the word change mean
22 to you?

23 A. Well, change can mean a variety
24 of things from changing my clothes to
25 changing my posture, any number of things.

1 T. JEFFERSON

2 But I just want to make sure I
3 understand what you're saying by change or
4 else I'll start an explanation that may not
5 address your question because I don't fully
6 understand it, Counsel.

7 MR. MERRILL: Excuse me. I
8 just have to note for the record an
9 objection that that was
10 nonresponsive.

11 Q. Please tell me about all the
12 written guidance that's been provided to
13 local congregations during the relevant
14 period regarding this principle about
15 keeping information received in confidence
16 confidential.

17 A. During the relevant period,
18 there have been a variety of letters,
19 Watchtower and Awake articles, certainly
20 the publications that are listed here that
21 remind elders of the principle we just read
22 in Deuteronomy 11. Here again, like
23 Deuteronomy 19:15, there have been multiple
24 references over that -- that 30-year or so
25 period. '72 -- 20 years or so.

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2 So I couldn't pinpoint exactly
3 every time that principle appeared,
4 Counsel. I can say, though, without
5 equivocation there have been numerous
6 reminders over that period of time in
7 various publications.

8 Q. And those publications provide
9 guidance and direction to elders with
10 regard to that principle; correct?

11 A. And to -- to the congregants in
12 general as well because often, Counsel,
13 guidance to elders is not always just to
14 elders. It's published in the Watchtower
15 so that all the congregants can read it.
16 So same thing with the publications we
17 discussed earlier like the Lamp book, the
18 Organized book, as we discussed earlier,
19 all the congregants receive it.

20 But those reminders on
21 confidentiality are published so that all
22 congregants see it so that they can be
23 assured that when they share confidential
24 information with elders, it will remain
25 just that. That's why it's published that

1 T. JEFFERSON

2 way.

3 Q. Now, if a child made an
4 allegation regarding child sexual abuse in
5 a congregation during the relevant period,
6 even if the child and their parents did not
7 wish to keep the allegation confidential,
8 the elders would be required to keep it
9 confidential; correct?

10 A. And so as stated, the elders
11 would maintain confidentiality. They
12 wouldn't discuss it with their wives, their
13 children, their friends or anyone else.
14 But the elders do not bar others, such as,
15 for example, in your illustration, the
16 parents and the child. They wouldn't bar
17 them.

18 Q. And I think you just mentioned
19 that the -- the principle applies not just
20 to elders, but to all Jehovah's
21 Witnesses -- correct -- in Deuteronomy?

22 A. The idea in Deuteronomy 19:15
23 of two witnesses to establish, that's
24 Deuteronomy 19:15. Are you referring --

25 Q. I'm sorry. I should've

1 T. JEFFERSON

2 referred to Proverbs. Forgive me. I think
3 I was trying to refer to the Proverbs --

4 A. Proverbs 11.

5 Q. -- regarding keeping things
6 confidential.

7 A. Yes. So what I said is it's
8 published so that all Jehovah's Witnesses
9 will be aware that when you confide in your
10 elders, they will observe the principle of
11 confidentiality. That's what I believe I
12 pointed out earlier.

13 Q. So I want to go back to this
14 example I gave of an allegation that's been
15 made in the -- about child sex abuse within
16 a congregation during the relevant period,
17 and the child and their parents have no
18 desire to keep the allegation confidential.

19 Is it acceptable for them to
20 discuss it with other members of the
21 congregation?

22 A. Yeah. So if a parent wants to
23 discuss it with the authorities, the school
24 or anybody else if parents feel -- or a
25 doctor -- that's up to the parents to --

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2 to -- to care for their child, whatever
3 they need to do.

4 Parents are reminded, of
5 course, that an accusation is not
6 established unless there are -- are two
7 witnesses, but parents are not told you
8 can't -- you can't report this. You can't
9 allege to the authorities that he molested
10 your child, no. They're not told that.
11 It's their choice.

12 Q. If they choose to share that
13 information, then they'll be judged by God;
14 correct?

15 A. If they choose to share that
16 information as a personal decision, that
17 would be up to them. I -- I can't say
18 judged by God. I would say that's their
19 personal decision.

20 Q. Would you say they'd be
21 answerable to God with respect to that
22 decision?

23 A. Any decision we all make makes
24 us answerable to God, Counsel. Any
25 decision.

1 T. JEFFERSON

2 D E C L A R A T I O N

3
4 I hereby certify that having been
5 first duly sworn to testify to the truth, I
6 gave the above testimony.
7

8 I FURTHER CERTIFY that the foregoing
9 transcript is a true and correct transcript
10 of the testimony given by me at the time
11 and place specified hereinbefore.
12
13
14

15 THOMAS JEFFERSON, JR.
16
17

18 Subscribed and sworn to before me
19 this _____ day of _____ 20____.
20
21

22 NOTARY PUBLIC
23
24
25